

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**RECEIVED**

ADWOWA JACOBS,

§

Plaintiff,

§

V.

§

ELECTRONIC DATA SYSTEMS  
CORPORATION AND JEFF  
WILLIAMS,

§

§

Defendants.

2006 SEP 25 P 3:57

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

CIVIL ACTION NO.

2:05-CV-925-MHT-SRW


**PLAINTIFF'S RESPONSE TO DEFENDANTS'  
JOINT MOTION TO HOLD PLAINTIFF'S DEPOSITION  
AT THE FEDERAL COURTHOUSE**

COMES NOW the Plaintiff, Adwowa Jacobs, and requests that this Honorable Court deny Defendants' Joint Motion To Hold Plaintiff's Deposition At the Federal Courthouse and for cause, states the following:

Allegation's being made by the Defendants' against the Plaintiff in the above styled cause of action are frivolous at best and certainly do not merit such an extreme measure as scheduling Depositions at the Federal Courthouse. Defendant's have no evidence that any threats were made against anyone and seem to be basing there Motion on the fact that the Plaintiff has a gun permit. Further, it appears that Defendant's accusations are designed for the sole purpose of casting a cloud over the credibility of the Plaintiff.

For the reasons stated above, Plaintiff respectfully requests that this Honorable Court deny the Defendants' Joint Motion to Hold Plaintiff's Deposition at the Federal Courthouse.

RESPECTFULLY Submitted this the 25<sup>th</sup> Day of Sept, 2006

  
L. D. WALKER, III (WAL143)  
Attorney For Plaintiff

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I certify that I have served a copy of the above and foregoing document upon the following parties, by United States mail, postage prepaid, and properly addressed on this the 25<sup>th</sup> day of Sept, 2006.

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